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September 14, 2022

Via ECF

Honorable Kenneth M. Karas, U.S.D.J.
U.S District Court for the S.D.N.Y.
300 Quarropas Street
White Plains, NY 10601

Re: Congregation Rabbinical College of Tartikov, Inc. et al v. Village of Pomona, NY et al.
7:20-cv-06158-KMK

Dear Judge Karas:

Our office represents the Defendants Village of Pomona and its Board of Trustees (collectively, "Village") in the above-captioned action. Pursuant to Rule 9.A of this Court's Individual Rules and Practices in Civil Cases, the Village respectfully requests permission to file in redacted form its Exhibit "A" to the Declaration of Brian D. Nugent in support of the Village's motion for attorney's fees and costs, which consists of attorney billing records.

The Village has redacted material consisting of attorney-client privileged and/or protected attorney work product descriptions of our work. The attorney narratives within Exhibit A contain privileged and protected material reflecting descriptions of counsel's litigation strategy and communications with clients. The Details of the services rendered by attorneys for their clients is protected. *See Elliott Assocs., L.P. v. Republic of Peru*, 176 F.R.D. 93, 97 (S.D.N.Y. 1997). Likewise, "[C]orrespondence, bills, ledgers, statements, and time records which also reveal the motive of the client in seeking representation, litigation strategy, or the specific nature of a service provided ... fall within the attorney-client privilege." *Bank Brussels Lambert v. Credit Lyonnais (Suisse) S.A.*, 1995 WL 598971, at *2 (S.D.N.Y. Oct. 11, 1995). Accordingly, Pursuant to Rule 9.A, the Village is electronically filing under seal a copy of the unredacted materials with the proposed redactions highlighted.

Granted.

So Ordered.

9/14/22

cc: All Counsel via ECF

Respectfully submitted,

Brian D. Nugent